

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 15**

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\*  
STARBUCKS CORPORATION \*  
\*  
and \* Cases 15-CA-290336  
\* 15-CA-290337  
\* 15-CA-293868  
WORKERS UNITED \* 15-CA-294687  
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**ORDER FURTHER CONSOLIDATING CASES, THIRD  
CONSOLIDATED COMPLAINT AND NOTICE OF HEARING**

On May 9, 2022, a Second Consolidated Complaint and Notice of Hearing issued in Cases 15-CA-290336, 15-CA-290337, and 15-CA-293868 alleging that Starbucks Corporation (Respondent) had engaged in unfair labor practices that violate the National Labor Relations Act (the Act), 29 U.S.C. § 151 et seq. Pursuant to Section 102.33 of the Rules and Regulations of the National Labor Relations Board (the Board) and to avoid unnecessary costs or delay, IT IS ORDERED THAT those cases are further consolidated with Case 15-CA-294687, filed by Workers United (the Union), which alleges that Respondent has engaged in further unfair labor practices within the meaning of the Act.

This Order Further Consolidating Cases, Third Consolidated Complaint, and Notice of Hearing, issued pursuant to Section 10(b) of the Act and Section 102.15 of the Board's Rules and Regulations, is based on these consolidated cases and alleges that Respondent has violated the Act as described below.

1. The charges in the above cases were filed by the Union, as set forth in the following table, and served upon Respondent on the dates indicated by U.S. mail:

<i><b>Case No.</b></i>	<i><b>Amendment</b></i>	<i><b>Date Filed</b></i>	<i><b>Date Served</b></i>
15-CA-290336		February 8, 2022	February 9, 2022
15-CA-290337		February 9, 2022	February 9, 2022
15-CA-293868		April 12, 2022	April 12, 2022
15-CA-293868	1 <sup>st</sup> Amended	May 9, 2022	May 9, 2022
15-CA-294687		April 26, 2022	April 26, 2022
15-CA-294687	1 <sup>st</sup> Amended	June 29, 2022	June 30, 2022

2. At all material times, Respondent, a Washington corporation with headquarters in Seattle, Washington, has been engaged in the retail operation of restaurants throughout the United States, including one located at 3388 Poplar Avenue, Memphis, Tennessee (Respondent's facility).

3(a) Annually, in conducting its operations described above in paragraph 2, Respondent derived gross revenues in excess of \$500,000.

(b) During the period of time described above in paragraph 3(a), Respondent purchased and received at its Memphis, Tennessee facility products, goods, and materials valued in excess of \$5,000 directly from points outside the State of Tennessee.

4. At all material times, Respondent has been an employer engaged in commerce within the meaning of Section 2(2), (6), and (7) of the Act.

5. At all material times, the Union has been a labor organization within the meaning of Section 2(5) of the Act.

6. At all material times, the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act and agents of Respondent within the meaning of Section 2(13) of the Act:

Brett Battes	-	Regional Vice President
Solon Flowers	-	Partner Asset and Protection Manager
Steve Fox	-	Senior Manager of Partner Relations
Kimberly Harris	-	Partner Relations Consultant
Amandalynn Line	-	Area Regional Director
Cedric Morton	-	District Manager
Denise Nelsen	-	Senior Vice President, US Operations
Elizabeth Page	-	Store Manager
Mia Poindexter	-	Assistant Store Manager
Rossann Williams	-	Executive Vice President, North America
Robert Wise	-	Partner Relations Manager

7(a) Beginning about January 19, 2022 and continuing, Respondent more closely supervised the work of its employees by increasing the frequency and length of time its managers are present at Respondent's facility.

(b) From about January 21 to January 23, 2022, Respondent closed the lobby/café portion of its facility.

(c) Between late January 2022 and early February 2022, a more exact date being currently unknown to the General Counsel, Respondent, by Elizabeth Page, at Respondent's facility, confiscated and removed pro-union materials from the community bulletin board.

8. About April 20, 2022, Respondent, by Cedric Morton, at Respondent's facility:

(a) Held a mandatory meeting with its employees on paid time concerning the exercise of their Section 7 rights concerning union representation.

(b) Threatened employees by isinforming them about their Section 9(a) right to deal directly with Respondent after designation of an exclusive union representative.

(c) Threatened employees by misinforming them about the requirement to pay union dues.

(d) Threatened employees by misinforming them about the meaning of their vote in a Board election.

(e) Implicitly threatened employees that it would be futile to select the Union as their bargaining representative.

(f) Threatened employees with futility and misrepresented the bargaining process to employees.

9(a) About January 12, 2022, Respondent issued two disciplinary write ups to its employee Cara Nicole "Nikki" Taylor.

(b) From about January 21 to January 23, 2022, Respondent closed the lobby/café portion of its facility.

(c) About February 8, 2022, Respondent discharged its employees:

(1) Florentino Escobar

(2) Lakota McGlawn

(3) Nabretta Hardin

(4) Luis "Beto" Sanchez

(5) Cara "Nikki" Taylor

(6) Kylie Throckmorton

(7) Emma Worrell

(d) Respondent engaged in the conduct described above in paragraphs 9(a) and 9(c) because the named employee joined or assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

(e) Respondent engaged in the conduct described above in paragraph 9(b) because its employees joined or assisted the Union and engaged in concerted activities, and to discourage employees from engaging in these activities.

10. By the conduct described above in paragraphs 7 and 8, Respondent has been interfering with, restraining, and coercing employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

11. By the conduct described above in paragraph 9, Respondent has been discriminating in regard to the hire or tenure or terms or conditions of employment of its employees, thereby discouraging membership in a labor organization in violation of Section 8(a)(1) and (3) of the Act.

12. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

### **REMEDY**

The General Counsel seeks an Order providing for all relief as may be just and proper to remedy the unfair labor practices alleged, including, but not limited to, requiring that Respondent:

(a) post and text, email, and mail the Notice to Employees to all employees employed at Respondent's facility, including those who were employed on and after January 14, 2022;

(b) Convene one or more mandatory meetings, on working time and at times when Respondent customarily holds employee meetings and scheduled to ensure the widest possible attendance, at Respondent's Memphis facility, during which the Notice to Employees and an Explanation of Rights will be read by Cedric Morton (or a high-level Respondent official), in the presence of a Board agent, to all employees, supervisor, managers, and agents, in English. Respondent shall also afford the Union, through the Regional Director, a reasonable notice and opportunity to have a representative present when the Notice and the Explanation of Rights are read to employees. Interpreters shall be made available for any individual whose language of fluency is other than English at Respondent's expense. Respondent shall announce the meeting(s) for the reading in the same manner it would customarily announce a meeting to employees; the meeting(s) shall be for the above-stated purpose only. Individuals unable to attend the meeting to which they have been assigned will be able to attend a subsequent meeting during which the same reading shall take place under the same conditions. Respondent shall allow all employees to attend these meetings without penalty or adverse employment consequences, either financial or otherwise.

(c) Distribute electronic copies of Cedric Morton or a high-level Respondent official (in the presence of a Board agent) reading the Notice to Employees and an Explanation of Rights, on its Partner Hub and all other intranet or internet sites or apps that Respondent uses to communicate with employees, such that the video can be accessed by employees at all of its stores in the United States and its Territories;

(d) Make the employees named above in paragraph 9(c) whole, including, but not limited to, by reimbursing them for all consequential harm they incurred as a result of Respondent's unlawful conduct; and

(e) Provide training to its supervisors and managers regarding employee rights under the Act.

### **ANSWER REQUIREMENT**

Respondent is notified that, pursuant to §§ 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before July 22, 2022, or postmarked on or before July 21, 2022.**

Respondent must serve a copy of the answer on each of the other parties.

The answer must be filed electronically through the Agency's website. To file electronically, go to [www.nlr.gov](http://www.nlr.gov), click on **E-File Documents**, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. *See* § 102.21. If the answer is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's

Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE THAT** on September 12, 2022, at 10:00 am (Central Time) at the United States Bankruptcy Court, 200 Jefferson Avenue, 9<sup>th</sup> Floor, Courtroom, Memphis, TN 38103, and on consecutive days thereafter until concluded, a hearing will be conducted before an administrative law judge of the National Labor Relations Board. At the hearing, Respondent and any other party to this proceeding have the right to appear and present testimony regarding the allegations in this complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: July 8, 2022

/s/ *M. Kathleen McKinney* by par \_\_\_\_\_  
**M. KATHLEEN McKINNEY**  
**REGIONAL DIRECTOR**  
**NATIONAL LABOR RELATIONS BOARD**  
**REGION 15**  
**600 South Maestri Place – 7th Floor**  
**New Orleans, LA 70130-3413**

Attachments



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Case 15-CA-290336

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

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Workers United  
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## Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: [www.nlrb.gov/sites/default/files/attachments/basic-page/node-1717/rules\\_and\\_regs\\_part\\_102.pdf](http://www.nlrb.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf).

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at [www.nlrb.gov](http://www.nlrb.gov), click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

**Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement.** The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

### I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

### II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered in evidence. If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing.

(OVER)

If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

### III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

**IMPORTANT NOTICE'**

The date, which has been set for hearing in this matter, should be checked immediately. *If* there is proper cause for not proceeding with the hearing on that date, a motion to change the date of hearing should be made within fourteen (14) days from the service of the complaint. Thereafter, it may be assumed that the scheduled hearing date has been agreed upon and that all parties will be prepared to proceed to the hearing on that date. Later motions to reschedule the hearing generally may not be granted in the absence of a proper showing of unanticipated and uncontrollable intervening circumstances.

All parties are encouraged to fully explore the possibilities of settlement. Early settlement agreements prior to extensive and costly trial preparation may result in substantial savings of time, money and personnel resources for all parties. The Board agent assigned to this case will be happy to discuss settlement at any mutually convenient time.

/s/ M. Kathleen McKinney

**M. KATHLEEN McKINNEY  
REGIONAL DIRECTOR**

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 15**

**STARBUCKS CORPORATION**

**and**

**WORKERS UNITED**

**Cases: 15-CA-290336  
15-CA-290337  
15-CA-293868  
15-CA-294687**

**RESPONDENT STARBUCKS CORPORATION'S ANSWER AND AFFIRMATIVE  
DEFENSES TO THIRD CONSOLIDATED COMPLAINT**

Respondent Starbucks Corporation (hereinafter "Respondent") hereby files this Answer to the General Counsel's Third Consolidated Complaint, as follows:

1. Respondent admits that it received the charges identified in paragraph 1 of the Third Consolidated Complaint but lacks the requisite knowledge to admit or deny the remaining allegations in this paragraph, and therefore denies those allegations.

2. Respondent admits the allegations contained in paragraph 2 of the Third Consolidated Complaint.

3. (a) Respondent admits the allegation contained in paragraph 3(a) of the Third Consolidated Complaint.

(b) Respondent admits the allegation contained in paragraph 3(b) of the Third Consolidated Complaint.

4. Respondent admits the allegations contained in paragraph 4 of the Third Consolidated Complaint.

5. Respondent admits the allegation contained in paragraph 5 of the Third Consolidated Complaint.

6. Respondent admits the allegations contained in paragraph 6 of the Third Consolidated Complaint.

Consolidated Complaint, except as to Mia Poindexter. Respondent denies the allegations contained in paragraph 6 of the Third Consolidated Complaint as they relate to Mia Poindexter.

7. (a) Respondent denies the allegations contained in paragraph 7(a) of the Third Consolidated Complaint.

(b) Respondent avers that it lacked the required staffing at the store located at 3388 Poplar Avenue, Memphis, Tennessee on January 21 and January 23, 2022 and therefore the café portion of the store was closed on those two days. Respondent denies that the café portion of the store was closed on January 22, 2022.

(c) Respondent denies the allegations contained in paragraph 7(c) of the Third Consolidated Complaint.

8. (a) Respondent denies the allegations contained in paragraph 8(a) of the Third Consolidated Complaint.

(b) Respondent denies the allegations contained in paragraph 8(b) of the Third Consolidated Complaint

(c) Respondent denies the allegations contained in paragraph 8(c) of the Third Consolidated Complaint.

(d) Respondent denies the allegations contained in paragraph 8(d) of the Third Consolidated Complaint.

(e) Respondent denies the allegations contained in paragraph 8(e) of the Third Consolidated Complaint

(f) Respondent denies the allegations contained in paragraph 8(f) of the Third Consolidated Complaint.

9. (a) Respondent admits on January 14, 2022, partner Cara Nicole Taylor



received one corrective action. Respondent denies that such action violated the Act and denies the remaining allegations contained in paragraph 9(a) of the Third Consolidated Complaint.

(b) Respondent incorporates by reference its response to paragraph 7(b) as though fully set forth herein.

(c) Respondent admits that it discharged the persons listed in paragraph 9(c) of the Third Consolidated Complaint but denies that such discharges violated the Act.

(d) Respondent denies the allegations contained in paragraph 9(d) of the Third Consolidated Complaint.

(e) Respondent denies the allegations contained in paragraph 9(e) of the Third Consolidated Complaint.

10. Respondent denies the allegations contained in paragraph 10 of the Third Consolidated Complaint.

11. Respondent denies the allegations contained in paragraph 11 of the Third Consolidated Complaint.

12. Respondent denies the allegations contained in paragraph 12 of the Third Consolidated Complaint.

13. Respondent denies each and every allegation not expressly admitted.

### **REMEDIES**

Remedy (a)-(e) Respondent denies that the General Counsel, the Charging Party, or the discriminatees are entitled to any of the requested remedies as set forth on pages 5-7 of the Third Consolidated Complaint and denies that the requested forms of relief under this Third Consolidated Complaint serve appropriate remedial purposes under the Act. Respondent further avers and states that the requested remedies, including but not limited to the requirements to read

the notice at one or more mandatory meetings at the Respondent's premises, to pay consequential damages, and to train supervisors, are extraordinary and punitive remedies not appropriate under the circumstances of this case.

### **AFFIRMATIVE AND OTHER DEFENSES**

1. The Third Consolidated Complaint fails to state a claim upon which relief may be granted.
2. The allegations in the Third Consolidated Complaint are impermissibly vague and ambiguous.
3. The allegations in the Third Consolidated Complaint, and the charges underlying the Third Consolidated Complaint, were filed and made in bad faith, and for vexatious and improper purposes, including to infringe upon Respondent's rights and the operation of its business.
4. To the extent that the Third Consolidated Complaint contains allegations that are beyond the scope of the charge(s), such allegations are barred.
5. At all material times, Respondent has acted in good faith and in compliance with the Act.
6. The individuals identified in paragraph 9 of the Third Consolidated Complaint were discharged for lawful reasons and for cause within the meaning of Section 10(c) of the Act and accordingly are not entitled to relief.
7. The individuals identified in paragraph 9 of the Third Consolidated Complaint violated Respondent's rules and practices, and also interfered with their own work, the work of employees and/or with Respondent's operations in properly and safely closing a store.

8. The National Labor Relations Board is not empowered to substitute its judgment for Respondent's lawful employment decisions, which it is seeking to do in the instant Third Consolidated Complaint, and by way of its requested remedies.

9. Assuming, arguendo, any Complaint allegation is found to be a violation of the Act, a retroactive remedy would be a manifest injustice and denial of due process.

10. Any statement made by any of Respondent's supervisor's and/or agents during the time covered by the Third Consolidated Complaint fall is protected under Section 8(c) of the Act, and as such, neither constitutes nor can be used as evidence of an unfair labor practice.

11. Insofar as this case comes before the Board, Members Gwynne Wilcox and David Prouty should recuse themselves based on their past, present and perceived relationship with the Service Employees ("SEIU") International and Local Unions, and their affiliates, including the Charging Party Workers United.

12. Any Complaint allegations outside the applicable statute of limitations or any evidence relating to conduct outside the applicable statute of limitations are time barred by Section 10(b) of the Act.

13. Respondent reserves the right to amend, modify, revise and plead further any additional defenses, affirmative or otherwise, during the course of these proceedings.

**WHEREFORE**, Respondent Starbucks Corporation prays that an Order dismissing the Third Consolidated Complaint in its entirety with prejudice, be entered and that Respondent have such other and further relief to which it may be entitled.

Respectfully submitted,

/s/ Arthur T. Carter

Arthur T. Carter

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ATTORNEYS FOR RESPONDENT  
STARBUCKS CORPORATION

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Answer to Consolidated Complaint were served on the following by electronic filing, email and/or U.S. mail this 22 day of July, 2022:

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